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Attorneys for KAREN GOWINS Creditor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas & Electric

☒ Affects Both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

)
) **Case No. 19-30088 (DM)**
) Chapter 11
) (Lead Case)
) (Jointly Administered)

) **DECLARATION OF STEVEN S. KANE**
) **IN SUPPORT OF JOINDER ON BEHALF**
) **OF KAREN GOWINS IN WILLIAM B.**
) **ABRAMS' MOTION TO DESIGNATE**
) **IMPROPERLY SOLICITED VOTES**
) **PURSUANT TO 11 U.S.C. §§ 1125(b) AND**
) **11226 (e) AND BANKRUPTCY RULE**
) **2019**

) Docket Nos. 6799, 6798, 6801

) Date: TBD

) Time: TBD

) Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

I, Steven S. Kane, hereby declare under penalty of perjury that the following is true and
correct to the best of my knowledge, information and belief.

1. I am a partner in the Kane Law Firm, counsel to Creditor Karen Gowins in the above

DECLARATION OF STEVEN S. KANE IN SUPPORT OF JOINDER ON BEHALF OF KAREN GOWINS IN
WILLIAM B. ABRAMS' MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11
U.S.C. §§ 1125(b) AND 11226(e) AND BANKRUPTCY RULE 2019

1 referenced case.

2 2. Exhibit 1 to this Joinder is a true and correct copy of a document entitled "Third
3 Amended Verified Statement of the Ad Hoc Committee of Senior Unsecured Note holders
4 Pursuant to Bankruptcy Rule 2019," which I downloaded directly from the official docket of this
5 case, using the Pacer system. It is docket No. 6747 on that system.
6

7 3. Exhibit 2 to this Joinder is a true and correct copy of a document entitled Declaration
8 of Mikal Watts in Support of his Preliminary Opposition to William B. Abrams Motion to
9 Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§ 1125 (b) and 1126(3) and
10 Bankruptcy Rule 2019 which I downloaded directly from the official docket of this case, using
11 the Pacer system. It is Docket No. 6801-1 on that system.
12

13 4. Exhibit 3 to this Joinder is a true and correct copy of a KQED news article of April 25,
14 2020 which I downloaded from the KQED website at
15 [https://www.kqed.org/news/11813173/attorney-for-pge-fire-victims-funded-by-wall-street-firms-](https://www.kqed.org/news/11813173/attorney-for-pge-fire-victims-funded-by-wall-street-firms-hes-negotiating-against?fbclid=IwAR27cMqjD7FB-AaEBnxI11tFulgOu7D8qPINAP55P4YPYPSIZXL4vzLEpww)
16 [hes-negotiating-against?fbclid=IwAR27cMqjD7FB-](https://www.kqed.org/news/11813173/attorney-for-pge-fire-victims-funded-by-wall-street-firms-hes-negotiating-against?fbclid=IwAR27cMqjD7FB-AaEBnxI11tFulgOu7D8qPINAP55P4YPYPSIZXL4vzLEpww)
17 [AaEBnxI11tFulgOu7D8qPINAP55P4YPYPSIZXL4vzLEpww](https://www.kqed.org/news/11813173/attorney-for-pge-fire-victims-funded-by-wall-street-firms-hes-negotiating-against?fbclid=IwAR27cMqjD7FB-AaEBnxI11tFulgOu7D8qPINAP55P4YPYPSIZXL4vzLEpww)
18

19 I declare under penalty of perjury that the foregoing is true and correct. Executed on April
20 25, 2020, at San Diego County, California.
21

22 /s/ Steven S. Kane

23 STEVEN S. KANE
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